

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_ )

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO: )  
 )  
Suits Naming the Tennessee Clinic )  
Defendants )  
 )

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**NOTICE OF FILING OF AMENDED DEPOSITION NOTICES**

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Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively "Tennessee Clinic Defendants") give notice to the Court and to all parties of the following:

1. Owen Finnegan's deposition noticed for August 24<sup>1</sup> is hereby postponed but is expected to be rescheduled. Once a deposition date is set, the Tennessee Clinic Defendants will file an amended notice of deposition.

2. Joseph Connolly's deposition noticed for August 25<sup>2</sup> is hereby postponed but is expected to be rescheduled. Once a deposition date is set, the Tennessee Clinic Defendants will file an amended notice of deposition.

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<sup>1</sup> The original notice is at Dkt. 2115-1.

<sup>2</sup> The original notice is at Dkt. 2115-2.

3. Annette Robinson's deposition noticed for August 27<sup>3</sup> is hereby postponed but is expected to be rescheduled. Once a deposition date is set, the Tennessee Clinic Defendants will file an amended notice of deposition.

4. Belmira Carvalho's deposition noticed for August 26<sup>4</sup> is hereby rescheduled for September 30. The deposition will begin at 10:00 am EDT and will occur at the law offices of Locke Lord, LLP, 111 Huntington Ave., Boston, MA 02199. An amended notice of deposition is attached to this notice as Exhibit 1.

5. Steven Haynes' deposition noticed for August 28<sup>5</sup> is hereby rescheduled for September 22. The deposition will begin at 11:00 am EDT and will occur at the law offices of Nutter, McClennan & Fish, Seaport West, 155 Seaport Blvd., Boston, MA 02210. An amended notice of deposition is attached to this notice as Exhibit 2.

6. Robert Ronzio's deposition noticed for August 31<sup>6</sup> is hereby postponed pending resolution of the criminal case pursuant to Magistrate Judge Boal's order at Dkt. 2123.

7. Sharon Carter's deposition noticed for September 1<sup>7</sup> is hereby postponed pending resolution of the criminal case pursuant to Magistrate Judge Boal's order at Dkt. 2123.

8. Scott Connolly's deposition noticed for September 1<sup>8</sup> is hereby postponed pending resolution of the criminal case pursuant to Magistrate Judge Boal's order at Dkt. 2123.

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<sup>3</sup> The original notice is at Dkt. 2115-4.

<sup>4</sup> The original notice is at Dkt. 2115-3.

<sup>5</sup> The original notice is at Dkt. 2115-5.

<sup>6</sup> The original notice is at Dkt. 2115-6.

<sup>7</sup> The original notice is at Dkt. 2115-7.

<sup>8</sup> The original notice is at Dkt. 2115-8.

9. John Notarianni's deposition originally noticed for June 9, 2015<sup>9</sup> is hereby rescheduled to September 9. The deposition will begin at 10:00 am EDT and will occur at the Law Offices of Gregory Schadone, LTD, 127 Dorrance St., Providence, RI 02903. An amended notice of deposition is attached hereto as Exhibit 3.

10. Mario Giamei's deposition noticed for June 10, 2015<sup>10</sup> is hereby rescheduled for September 24. The deposition will begin at 9:00 am EDT and will occur at the law offices of Nutter, McClennan & Fish, Seaport West, 155 Seaport Blvd., Boston, MA 02210. An amended notice of deposition is attached to this notice as Exhibit 4.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

/s/ Chris J. Tardio

**C.J. Gideon, Jr.\***

**Chris J. Tardio\***

**Alan S. Bean\*\***

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***Attorneys for the Tennessee Clinic  
Defendants***

\* Admitted pursuant to MDL Order No. 1.

\*\* Admitted *pro hac vice*.

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<sup>9</sup> The original notice is at Dkt. 1782.

<sup>10</sup> The original notice is at Dkt. 1773.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 21st day of August, 2015.

/s/ Chris J. Tardio

**Chris J. Tardio**